

July 16, 2012

NOTICE OF EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th. SW
Washington, D.C. 20554

**Re: Lifeline Link Up Reform and Modernization - WC Docket No. 11-42
Federal-State Joint Board on Universal Service – CC Docket No. 96-45
Lifeline and Link Up – WC Docket No. 03-109
Advancing Broadband Literacy Through Digital Literacy Training - WC
Docket No. 12-23**

Dear Ms. Dortch:

On Monday July 16, 2012 Amina Fazlullah and Sandy Tsai of the Benton Foundation¹ along with Sarah Morris of the Open Technology Institute at New America Foundation (NAF), Michael Scurato and Brenda Villanueva of the National Hispanic Media Coalition (NHMC), Cheryl Leanza of the United Church of Christ Office of Communication Inc.² (UCC OC Inc.) and Olivia Wein of the National Consumer Law Center (NCLC) met with Commissioner Rosenworcel's Wireline Advisor, Priscilla Argeris, regarding the above caption Lifeline and Link Up proceedings.

The Benton Foundation (Benton) urged the Commission to focus closely on the needs of the Lifeline population while crafting a digital literacy program. Benton also strongly encouraged the Commission to direct digital literacy funds towards groups that are already

¹ www.benton.org, Benton Foundation public filings, including but not limited to these reply comments, represent the institutional view of the Foundation as opposed to the views of any individual officer or director.

² The United Church of Christ is a faith community rooted in justice. It established the Office of Communication, Inc. in 1959 as its agency working to replace the media we have with the media we need to create a just society. Learn more about UCC OC Inc. at www.uccmediajustice.org.

successfully working on digital literacy issues. Benton expressed concern towards a potential digital literacy program that would direct money for digital literacy to Eligible Telecommunication Carriers (ETCs) or through ETCs. ETCs have no expertise in digital literacy training and Benton is concerned that a direction of digital literacy funds through ETCs would result in poor digital literacy outcomes. Benton urged the Commission to carefully craft a program that would ultimately support the good digital literacy programs spurred by NTIA efforts and to also consider programs run by schools, libraries and other community anchor institutions.

NAF similarly urged the Commission to structure the proposed digital literacy program in a way that does not direct support to ETCs. Instead, NAF noted that community organizations and facilities that already have community ties are the best entities to which to direct digital literacy support, as they are places that have already established trust within those communities, and they provide encouraging and accommodating venues for digital literacy training and other assistance. NAF also highlighted the need for the Commission's digital literacy program to support existing digital literacy training efforts, and it noted the harms that may result if those efforts are excluded. Many existing digital literacy training efforts could benefit from continued support, and excluding them would both create a new batch of time-limited digital literacy opportunities and would prevent existing programs from sharing their experiences and knowledge with others as the Commission's program is developed.

NHMC echoed the statements of others and urged the Commission to direct any digital literacy efforts to support community anchor institutions, such as schools and libraries, that have already successfully implemented formal and informal digital literacy programs in their communities. Regardless of where the proposed program is housed, supporting existing efforts

would be the most efficient use of any funds. Further, these institutions already play a unique role in providing access to those who have not yet adopted broadband at home and would be effective at promoting adoption by providing locations where the value of the service can be demonstrated.

UCC OC Inc. indicated its alignment with the other participants in the meeting and highlighted previously-filed comments by the Leadership Conference Media & Telecommunications Task Force, emphasizing its agreement with the points made by Benton Foundation and NAF.³ UCC OC Inc. emphasized its support of the e-rate program, and an interest in collaborating to find common ground to identify effective means to support digital literacy efforts around the country without developing a program that directs funds to carriers without expertise or connections relevant to effective digital literacy. UCC OC Inc. also expressed significant concern with the pace of movement toward FCC programs to support broadband access and digital literacy, and encouraged the FCC to look at innovative ways to structure these programs, consistent with the Leadership Conference's original comments in the Lifeline docket.⁴

NCLC expressed a strong interest in a robust digital literacy program that would be available for the full array of Lifeline-eligible consumers and also voiced support for designing a digital literacy program that allows community anchor institutions to have a key role in providing the trainings. NCLC noted its recent joint consumer filings regarding the structure of a digital literacy program also expressed concern over reliance on ETCs to provide the digital literacy training, as this is outside of their core competency.

³ The comments are available in the Commission's record in this docket at <http://apps.fcc.gov/ecfs/document/view?id=7021976052>

⁴ These comments are available in the Commission's record in CC Docket No. 96-45 at: <http://apps.fcc.gov/ecfs/document/view?id=7021240533>.

Sincerely,

/s/

Amina Fazlullah
Policy Counsel
Benton Foundation